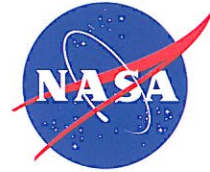


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

June 7, 2012



General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the American Institute of Aeronautics and Astronautics (AIAA), National Capital Section (NCS) Awards Banquet on June 8, 2012

On June 8, 2012, the American Institute of Aeronautics and Astronautics (AIAA), National Capital Section (NCS), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host its Awards Banquet. The special guest speaker will be Assistant Secretary of Commerce for Environmental Observation and Prediction Kathryn Sullivan. Dr. Sullivan is also a former astronaut.

The event will take place at Army Navy Country Club, in Arlington, VA, from 6 PM to 9 PM. Approximately 80-100 people are expected to attend. The estimated cost of the event including all food and beverages is \$30.00 per person. The event will be attended by state and local officials, representatives of the aerospace industry, non-profit organizations and professional societies, academia, and other Federal agencies. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will provide NASA attendees with the opportunity to discuss science and exploration related initiatives with other guests. Accordingly, NASA employees – including non-career appointees required to sign the ethics pledge under Executive Order 13490 – who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone